

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 19-CR-20425

v.

HON. BERNARD A. FRIEDMAN

MARIO KEEREAM JACKSON,

Defendant.

**STIPULATION TO ADJOURN SENTENCING AND TO
EXTEND THE DEADLINE FOR FILING OBJECTIONS TO THE
PRESENTENCE INVESTIGATION REPORT**

The United States of America and defendant Mario Keeream Jackson, by and through their respective counsel, STIPULATE AND AGREE that the sentencing hearing scheduled for September 26, 2023, at 11:00 a.m., shall be adjourned to October 31, 2023, at 10:00 a.m. and that the deadline for filing objections to the presentence investigation report be extended to September 15, 2023. In support of the stipulation, the parties state:

1. On May 23, 2023, a jury convicted the defendant of multiple counts including several counts of Hobbs Act robbery and several counts of use of a firearm during and in relation to a crime of violence.
2. On August 21, 2023, the probation department provided the parties with the presentence investigation report (PSIR).
3. Objections to the PSIR are due September 4, 2023.
4. The parties need additional time to adequately prepare for sentencing. Specifically, based on the number of offenses the defendant was convicted of the parties need additional time to review the PSIR, and file objections, if any, with the probation department.
5. In addition, defense counsel needs additional time to review the PSIR with the defendant, who is incarcerated. Defense counsel also needs additional time to compile mitigating information and prepare a sentencing memorandum.
6. The government needs additional time to obtain victim impact statements from multiple victims so that the government can prepare a thorough sentencing memorandum for the Court.
7. The parties request that the deadline to file objections to the PSIR with the probation department be extended to September 15, 2023. The Probation Agent preparing the PSIR has no objection to this request.

8. The parties request this Court to adjourn the sentencing hearing from September 26, 2023, at 11:00 a.m., to October 31, 2023, at 10:00 a.m.

IT IS SO STIPULATED.

Respectfully submitted,

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Date: September 5, 2023

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 19-CR-20425

v.

HON. BERNARD A. FRIEDMAN

MARIO KEEREAM JACKSON,

Defendant.

**ORDER ADJOURNING SENTENCING AND EXTENDING
THE DEADLINE FOR FILING OBJECTIONS TO THE
PRESENTENCE INVESTIGATION REPORT**

Upon this Court's consideration of the stipulation of the parties to adjourn sentencing, and the Court being apprised of the circumstances, for the reasons set forth in the parties' stipulation, **IT IS ORDERED** that:

1. The deadline to file objections to the presentence investigation report is extended to September 15, 2023.
2. The sentencing hearing scheduled for September 26, 2023, at 11:00 a.m., shall be adjourned to October 31, 2023, at 10:00 a.m.

SO ORDERED.

Dated: September 8, 2023
Detroit, Michigan

s/Bernard A. Friedman
Hon. Bernard A. Friedman
Senior United States District Judge